

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions

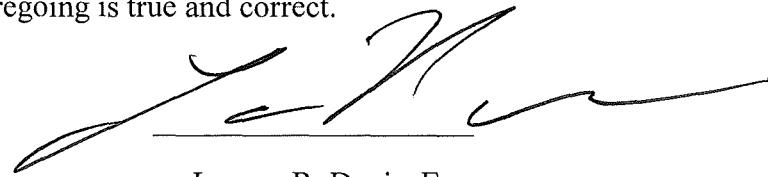
**DECLARATION OF LAUREN DAVIS, ESQUIRE, IN SUPPORT OF THE
RESPONSE TO ORDER TO SHOW CAUSE**

Lauren Davis hereby declares that the following is true and correct:

1. I am an attorney admitted to practice law in the State of California. I am an associate in the law firm of Andrews & Thornton ("A&T"), residing in the California office located at 2 Corporate Park, Suite 110, Irvine, CA 92606.
2. A&T represents approximately two hundred (200) claimants in the bankruptcy. Most of these claimants required lien resolution.
3. All of the potential Medicare liens and private healthcare liens that we are aware of have been resolved. The remaining cases require lien resolution for Medicaid and/or Tricare.
4. A&T hired a lien negotiator to resolve all remaining liens.
5. Several of the sixty-seven (67) unresolved liens as of December 2017 have since been resolved, and certification has been submitted to the Tort Trustee.
6. I expect the remaining liens to be resolved within the next thirty (30) to sixty (60) days.

7. Over the past few months, my paralegal and I have spoken with the office of the Tort Trustee on at least three occasions to discuss the status of lien resolution. We will further correspond with the office of the Tort Trustee with status as necessary.

I declare under penalty of perjury that the foregoing is true and correct.



Lauren R. Davis, Esq.